

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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BOUNTS TECHNOLOGIES LTD.,	:	
	:	CASE NO. 2:23-cv-890
Plaintiff,	:	
	:	
v.	:	Judge Mia Roberts Perez
CONNECTIFY, INC. AND DOES 1-100,	:	
	:	
Defendants.	:	
	:	

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**MOTION OF DEFENDANT, CONNECTIFY, INC., FOR RULE 11 SANCTIONS  
AGAINST PLAINTIFF AND ITS COUNSEL**

Defendant, Connectify, Inc. (“Connectify”) hereby moves for an order imposing sanctions against Plaintiff, Bounts Technologies Ltd. (“Plaintiff”), and its counsel, Todd E. Zenger, Esquire, Ryan E. Borneman, Esquire, and Mark. E. Seiberling, Esquire, pursuant to Rule 11 of the Federal Rules of Civil Procedure and incorporates herein by reference the accompanying Brief and Exhibits.

Respectfully submitted,

Stradley Ronon Stevens & Young, LLP

/s/ Samantha Kats

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Dated: September 22, 2023